

NUKK-FREEMAN & CERRA, PC
EMPLOYMENT ATTORNEYS

April 25, 2022

Via Electronic Filing

The Honorable Judge Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza E.
Brooklyn, New York 11201

RE: Algie Norris, et al. v. ProCORE, LLC, et al.
Civil Action No.: 1:21-cv-07014-BMC

Dear Judge Cogan:

This firm represents Defendants ProCORE, LLC and Jack Brown (“Defendants”) in the above matter. We write the Court to request an extension of the May 2, 2022 Discovery End Date for 120 days, until **Tuesday, August 30, 2022**. This request is made jointly and on the consent of all parties.

On April 22, 2022, the parties received the Court’s Order and Opinion on the Plaintiff’s Motion for Conditional Collective Certification under 29 U.S.C. 216(b) of the Fair Labor Standards Act (“FLSA”), in which the Court granted conditional certification on an FLSA class consisting of all security guards at the two locations in which Plaintiff and Opt-In Plaintiff Shalette Smith worked. Defendants have 21 days from receipt of the Order to provide contact information for potential opt-in plaintiffs, and the opt-in period will then last an additional 60 days. Following the opt-in period, the parties will likely need to conduct certain additional discovery. As such, the parties jointly request a 120 day extension of the current fact discovery deadline, which will allow sufficient time for the foregoing. We further note that during the initial scheduling conference, the Court noted that the current discovery end date was based solely on Plaintiff and Opt-in Plaintiff Smith, but that extensions would be granted as required to account for a larger FLSA collective.

If Your Honor requires any additional information, same will be supplied immediately upon request. We thank the Court for Your Honor’s time and consideration.

Respectfully submitted,

NUKK-FREEMAN & CERRA, P.C.



Kegan S. Andeskie, Esq.

KSA:bw

cc: Amit Kumar, Esq. (*via ECF*)

NUKK-FREEMAN & CERRA, PC
EMPLOYMENT ATTORNEYS

The Honorable Judge Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
April 25, 2022
Page 2

SO ORDERED: _____ DATE: _____
HON. BRIAN M. COGAN, U.S.D.J.